UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

LeMond Cycling, Inc., Plaintiff, v. Trek Bicycle Corporation, Defendant/Third-Party Plaintiff, v. Greg LeMond, Third-Party Defendant.	Civil No. 08-1010 (RHK-JSM) Judge Richard H. Kyle Magistrate Judge Janie S. Mayeron

DECLARATION OF JENNIFER M. ROBBINS IN OPPOSITION TO
TREK'S MOTION TO COMPEL ANDREU TAPE RECORDING

I, Jennifer M. Robbins, hereby declare as follows:

1. I am one of the attorneys representing Plaintiff LeMond Cycling, Inc. and Third-Party Defendant Greg LeMond in this case. I make this declaration in opposition to Trek's Motion to Compel Andreu Tape Recording.

2. Attached to this Declaration as Exhibit 1 is a true and correct copy of a letter from Kristal Stippich of Gass Weber Mullins LLC to Jennifer Robbins

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and Katherine Bruce of Robins, Kaplan, Miller & Ciresi L.L.P. dated April 24, 2009.

3. Attached to this Declaration as Exhibit 2 is a true and correct copy of a letter from Jennifer Robbins to Kristal Stippich dated April 28, 2009.

4. Attached to this Declaration as Exhibit 3 is a true and correct copy of a letter from Kristal Stippich to Jennifer Robbins dated April 29, 2009.

5. Attached to this Declaration as Exhibit 4 is a true and correct copy of a letter from Jennifer Robbins to Kristal Stippich dated April 30, 2009.

6. Attached to this Declaration as Exhibit 5 is a true and correct copy of a letter from Ralph Weber of Gass Weber Mullins LLC to Denise Rahne of Robins, Kaplan, Miller & Ciresi L.L.P. dated June 29, 2009.

7. Attached to this Declaration as Exhibit 6 are true and correct copies correspondence between Jennifer Robbins and Kristal Stippich dated July 6 and July 8, 2009.

8. Attached to this Declaration as Exhibit 7 is a true and correct copy of a letter from Jennifer Robbins to all counsel serving Plaintiff’s revised privilege log dated July 15, 2009.

9. Attached to this Declaration as Exhibit 8 is a true and correct copy of *Reed v. Cedar County*, No. C05-0064, 2006 WL 2246414 (N.D. Iowa Aug. 4, 2006).

10. Attached to this Declaration as Exhibit 9 is a true and correct copy of *Kallas v. Carnival Corp.*, No. 06-20115-CIV, 2008 WL 2222152 (S.D. Fla. May 27, 2008).

11. Attached to this Declaration as Exhibit 10 is a true and correct copy of *Versatile Metals, Inc. v. Union Corp.*, Civ. A. No. 85-4085, 1987 WL 11229 (E.D. Pa. May 22, 1987).

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 1st day of September, 2009.

/s/ Jennifer M. Robbins
Jennifer M. Robbins